

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION	
Kevin Turner and Shawn Wooden, on behalf of themselves and others similarly situated, <p style="text-align: center;">Plaintiffs, v.</p> National Football League and NFL Properties LLC, Successor-in-interest to NFL Properties, Inc., <p style="text-align: center;">Defendants.</p>	No. 2:12-md-02323-AB MDL No. 2323 Honorable Anita B. Brody Civ. Action No. 14-00029-AB
THIS DOCUMENT RELATES TO: ALL ACTIONS	

**JOINDER OF SHENAQ PC IN THE MOTION OF THE NFL PARTIES AND CLASS
COUNSEL TO APPROVE MODIFICATIONS TO THE NFL CONCUSSION
SETTLEMENT AGREEMENT PURSUANT TO SECTION 6.6**

Shenaq PC joins the Motion of the NFL Parties and Class Counsel to Approve Modifications to the NFL Concussion Settlement Agreement Pursuant to Section 6.6 (the “Norming Settlement”) [ECF Doc. #11567].

Shenaq PC represents retired NFL football players, a number of whom were, or would have been, unfairly penalized under the Settlement Protocol’s previous race-norming standards, simply based upon the color of their skin. Shenaq PC applauds the efforts of Class Counsel and the NFL Parties, under the prudent guidance of Magistrate Judge Strawbridge and Special Master Hoffman, to agree in good faith to correct this injustice.

A person's access to justice should never be encumbered by his race, and medical evaluations should never depend upon the color of his skin. As Justice Harlan presciently wrote as the lone dissenter in *Plessy v Ferguson*:

But in the view of the constitution, in the eye of the law, there is in this country no superior, dominant, ruling class of citizens. There is no caste here. Our constitution is color-blind, and neither knows nor tolerates classes among citizens. In respect of civil rights, all citizens are equal before the law. The humblest is the peer of the most powerful. The law regards man as man, and takes no account of his surroundings or of his color when his civil rights as guaranteed by the supreme law of the land are involved.

Plessy v. Ferguson, 163 U.S. 537, 559, 16 S.Ct. 1138, 41 L.Ed. 256 (1896) (Harlan, J., dissenting).

The Norming Settlement embraces these guiding ideals and represents a significant step towards race-neutral fairness and justice for all parties involved in the NFL Concussion Settlement. Accordingly, Shenaq PC strongly supports the immediate approval and implementation of the Norming Settlement.

Respectfully submitted,

SHENAQ PC

/s/ Amir Shenaq

Amir Shenaq

State Bar No. 505281

3500 Lenox Road Ste. 1500

Atlanta, GA 30326

Telephone: (888) 909-9993

Telecopier: (713) 583-3538

E-mail: amir@shenaqpc.com

CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing Notice of Attorney's Lien to be served via the Electronic Case Filing (ECF) system in the United States District Court for the Eastern District of Pennsylvania, on all parties registered for CM/ECF in the litigation.

Dated: January 6, 2022.

/s/ Amir Shenaq
Amir Shenaq